

October 7, 2020

**VIA ECF**

The Honorable Barbara Moses  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street, Courtroom 20A  
New York, NY 10007

Re: *In re Global Brokerage, Inc. f/k/a FXCM, Inc. Securities Litigation*,  
Master File No. 1:17-cv-00916-RA-BCM

Dear Judge Moses:

Pursuant to the Court's Order dated October 2, 2020 (ECF No. 206), Plaintiffs 683 Capital Partners, LP, Shipco Transport Inc., and E-Global Trade and Finance Group, Inc., and Defendants Global Brokerage, Inc. f/k/a FXCM, Inc., Dror Niv, and William Ahdout submit this joint letter to propose a specific allocation of time for witness testimony and oral argument for the evidentiary hearing scheduled for October 15, 2020 at 1:00 p.m. The parties propose the following schedule for the October 15 hearing:

<b>Event</b>	<b>Time Limit</b>
Plaintiffs' opening statement	5 minutes
Defendants' opening statement	5 minutes
Defendants' cross examination of Dr. Werner	Up to 105 minutes
[five-minute break]	
Plaintiffs' redirect of Dr. Werner	Up to 105 minutes
[five-minute break]	
Plaintiffs' cross examination of Prof. Hendershott	Up to the balance of 105 minutes not used by Plaintiffs on Dr. Werner
[five-minute break]	
Defendants' redirect of Prof. Hendershott	Up to the balance of 105 minutes not used by Defendants on Dr. Werner
[five-minute break]	
Plaintiffs to open oral argument on class certification motion	20 minutes
Defendants' rebuttal	20 minutes
Plaintiffs' response	10 minutes
Defendants' response	10 minutes

With respect to a videoconference vendor the parties propose using Veritext. The Parties and the two witnesses are already familiar with Veritext's Zoom-based videoconference and exhibit-sharing platform. If this platform is acceptable to the Court, the Parties will coordinate with the Court and Veritext in advance of the hearing to arrange access for the Court, a listening option for the public, and to address any technical issues that may arise.

Respectfully submitted,

**THE ROSEN LAW FIRM, P.A.**

/s/ Joshua Baker

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